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Please Reference Our File # in Your Correspondence Documents Can be Sent to legaldocs@farmers.com

April 17, 2015

Custodian of Records United States Environmental Protection Agency 75 Hawthorne Street San Francisco, CA. 94105

Re:

VINCENT FRANK KOOSH, et al. v. FRANKLIN PLAZA, LLC, et al.

Case No.:

BC566067

Our File No.: 14-364780

<u>PUBLIC RECORDS REQUEST RE: 1912 TAMARIND AVENUE, LOS ANGELES, CALIFORNIA 90068</u>

Dear Custodian of Records:

This office has been retained to represent Franklin Plaza, LLC, Daniel Saparzadeh and Jack Simantob who are the legal owners of 1912 Tamarind Avenue, Los Angeles, California 90068. Due to the nature of the claims, our clients must obtain records pertaining to any and all complaints or reports made to the County of Los Angeles Department of Public Health.

Pursuant to the Freedom of Information Act and the California Public Records Act, please provide copies of any and all documents, including but not limited to inspection records, field notes, violation notices, electronic and/or computerized records, memos and correspondence for any and all dates (starting in approximately 2003) in connection with 1912 Tamarind Avenue, Los Angeles, California 90068.

If the US EPA intends to withhold documents that are responsive to the Freedom of Information Act or the California Public Records Act, please specifically identify those documents when responding to this request. If there is a fee for copying the records, please notify us immediately.